

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA

v.

SHAWN ROBINSON NELSON

INDICTMENT

Case No. _____

Violations: 18 U.S.C. §§ 2252(a)(2),
2252(b)(1), and 2253(a)

Receipt of Images Depicting the Sexual Exploitation of Children

The Grand Jury Charges:

From in or about October 2019 to in or about March 2021, in the District of North Dakota, and elsewhere,

SHAWN ROBINSON NELSON

knowingly received visual depictions using a means and facility of interstate and foreign commerce, to wit: the internet, which depictions had been transported in interstate and foreign commerce by any means, the production of which visual depictions involved the use of a minor engaging in sexually explicit conduct and which depictions were of such conduct;

In violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

FORFEITURE ALLEGATION

The Grand Jury Further Finds Probable Cause That:

Upon conviction of violating Title 18, United States Code, Section 2252, as charged in this Indictment,

SHAWN ROBINSON NELSON

shall forfeit to the United States any and all matter which contains visual depictions produced, transported, shipped, and received in violation thereof and any and all property used and intended to be used in any manner and part to commit and to promote the commission of such violations, including, but not limited to, the following:

- One Dell Latitude 3480 Laptop Computer; and
- One Amazon Kindle, Model Number D01200.

By virtue of commission of one or more of the felony offenses as charged in this Indictment, all right, title, and interest in the above-described property is vested in the United States and is hereby forfeited to the United States, pursuant to Title 18, United States Code, Section 2253(a).

A TRUE BILL:

/s/ Foreperson

Foreperson

/s/ Nicholas W. Chase

NICHOLAS W. CHASE

United States Attorney

GLD/tmg